

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

VERY REVEREND GEORGES F. DE LAIRE, J.C.L.,

Plaintiff,

v.

Case No. 1:21-CV-00131-JL

GARY MICHAEL VORIS; ANITA CAREY; ST.
MICHAEL'S MEDIA a/k/a CHURCH MILITANT,
and MARC BALESTRIERI,

Defendants.

NOTICE OF FILING OF UNSWORN DECLARATION OF CHRISTINE NILES

Attached is the Unsworn Declaration of Christine Niles.

MADDIN, HAUSER, ROTH & HELLER, P.C.

NICHOLSON LAW FIRM, PLLC

/s/ Kathleen H. Klaus
Kathleen H. Klaus (MI Bar #67207)
Pro Hac Vice
Attorney for Michigan Defendants
28400 Northwestern Hwy, 2nd Floor
Southfield, MI 48034
(248) 359-7520
kklaus@maddinhauser.com

/s/ Neil B. Nicholson
Neil B. Nicholson (NH Bar #18341)
Attorney for Michigan Defendants
58 North State Street
P.O. Box 4137
Concord, NH 03302
(603) 856-8441
neil@nicholson-lawfirm.com

Dated: July 13, 2023

UNSWORN DECLARATION OF CHRISTINE NILES

1. I am a Senior Producer and Investigative Reporter at St. Michael's Media ("Church Militant"), specializing in exposing predator clergy. My work has resulted in the arrest of pedophiles.
2. Although I am not a practicing attorney, I am a graduate of University of Notre Dame Law School and clerked for the Indiana Supreme Court and served as a judicial intern on the United States Court of Appeals for the 10th Circuit.
3. When I came to work at Church Militant in 2014, I established the copy editor position because of my background in copy editing. Since my time working at this organization, which spans nearly a decade, I have copy edited and published thousands of articles.
4. Marc Balestrieri was a confidential source for Church Militant for years and occasionally wrote articles for Church Militant, using various pseudonyms because he insisted on anonymity.
5. Mr. Balestrieri would discuss various articles using different emails.
6. Mr. Balestrieri wrote the article published by Church Militant on January 17, 2019 titled "NH Vicar Turns Dogma Into Hearsay." There was nothing unique about the article that would have caused it to stand out in my memory. It was simply one among thousands of articles I was copy editing and publishing. I did not make any substantive changes to the article before publishing it.
7. Normally, freelance authors submit articles through email. After reviewing the articles and asking questions regarding any aspects that are unclear, I or another copy editor would input them into our publishing platform and make whatever editorial changes necessary before publishing. This was our procedure with many of Mr. Balestrieri's articles.
8. When Church Militant received a discovery request asking for copies of the drafts of the January 17, 2019 article, I searched my email archives to find any drafts submitted by Mr. Balestrieri. I believe Michael Voris and Church Militant's IT professionals separately conducted an exhaustive search.
9. I did not locate any drafts or emails with Mr. Balestrieri about the January 17, 2019 article.
10. When we received a request for records relating to Mr. Balestrieri being a source and author of articles for Church Militant, I again did a search, using his various emails, responsive to the requests. Our IT professionals also did a search and collected hundreds of emails and produced them.
11. Sometime after the deposition in this case of Br. Andre Marie, my counsel informed me that Br. Andre testified that Mr. Balestrieri falsely told him that he did not author the January article. This was the first I heard that Mr. Balestrieri had misrepresented his authorship. He is indeed the author. I received the article directly from him. My only role was to ask questions about the contents of the article for the purposes of clarification, enter them into our publishing platform, make minor editorial or grammatical corrections, and publish it. In all of my conversations with Mr. Balestrieri, he never denied being the author and he knew that I knew he was the author, because I was the copy editor of the article.
12. On the morning of June 15, 2023, Church Militant's attorney forwarded to me a copy of an email Mr. Balestrieri sent to the court, stating that there were "false assertions of fact and claims that have been asserted by more than one party" and wanting his "day in court." I

assumed this to mean that Mr. Balestrieri was again going to deny that he had written the article. I assumed this because of what Br. Andre said in his deposition.

13. On June 15, 2023, Church Militant Chief-of-Staff Simon Rafe sent me an email noting, "Looking at the article itself, I think it was copy-pasted from a Google doc. Therefore, the doc might still exist within Google and that would have the 'how we took delivery' record." as a result of Mr. Rafe's suggestion, I searched Google Drive, which is a platform that allows us to store documents and files. I was able to locate a draft of the article. Google Drive data indicated that "Tom Moore" was the owner, and thus the originating author, of the draft.
14. Because Google Drive is not the normal means of submitting author articles, I never thought to look there. In fact, to date I believe Mr. Balestrieri is the only freelance author to have shared his articles from Google Drive. In light of the thousands of articles I have copy edited over the course of nine years, it was simply not a place I thought to look.
15. It was during the June 15th Google Drive search that I recalled that Mr. Balestrieri had asked that we create an alias email for him to communicate with: tommooore@churchmiliant.com. This was the email account he shared his January 2019 article with me from on Google Drive. I immediately informed Mr. Voris and my counsel and sent a screenshot of the Google Drive data proving Tom Moore's ownership. I understand that screenshot has been produced in this case.
16. When I produced the screenshot of the Google Drive data, I assumed my counsel understood that this indicated information from a draft of Mr. Balestrieri's article. I learned on July 13, 2023 that she is unfamiliar with Google Drive and she did not realize this was data attached to a draft of an article. Failure to produce the draft on June 15, 2023 came down to a simple misunderstanding, and not any deliberate intent to withhold information, either on my part or on counsel's part.
17. My counsel told me to look for all emails to and from tommooore@chuchmiliant.com. I performed a search for those emails and produced them.
18. While my primary work now is as an investigative reporter, during my time copy editing I reviewed thousands of emails and drafts of articles. The article in question was published in January 2019 and years passed before we were asked to gather information related to the article. In performing the searches for discovery, I was acting on my best recollection of how I worked with Mr. Balestrieri. In all sincerity, I forgot that he did not email me the article, but shared it through his Google Drive under his alternate email tommooore@churchmiliant.com.

I declare under penalty of perjury that the forgoing is true and correct.

Executed this 13 day of July, 2023.



Christine Niles

VICAR OF MANCHESTER CHANGES DOGMA INTO HERESY

NEWS: [COMMENTARY](#)

by [Church Militant](#) • ChurchMilitant.com • January 17, 2019

0 Comments

Official abuses Power of Office to Corrupt the Faith and persecute Faithful

In a disturbing turn of events, a chancery official of the diocese of Manchester, New Hampshire has changed a solemnly defined dogma of the Faith into a heresy.

Father Georges de Laire, appointed by Bp. Peter Libasci as judicial vicar and vicar for canonical affairs, timed his actions to coincide with his bishop **departing for Chicago** to do penance for abusive priests. On Jan. 7, 2019, he struck.

In an undated text, **the official imposed a series of 15 “precepts”** upon **the** members of the St. Benedict Center, a community of devout lay women and men **devoted to spreading** the Church's official teaching on the need for all souls to join the Church in order to be saved. **Without evidence whatsoever, the vicar, moreover asserts in his letter that his “precepts” are being imposed “at the direction” of the Congregation for the Doctrine of the Faith.**

The 15 precepts range from a prohibition to identifying themselves as “Catholic” to even merely **“presenting” any doctrines whatsoever of the Roman Catholic Church.**

In November 1302, in what the historian Brian Tierney calls one of "the most famous of all the documents on church and state" entitled *Unam Sanctam* ("One Holy"), Pope Boniface VIII, invoking the plenitude of his apostolic power, defined the ancient doctrine *Extra Ecclesiam Nulla Salus* — "outside the Church there is no salvation." This teaching was raised by him to the level of a solemnly defined dogma of divine and Catholic faith (*De Fide Divina et Catholica Solemniter Definita*).

[Free clip from](#) **CHURCH MILITANT** Premium

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The Second Vatican Council and the current Catechism of the Catholic Church, in article 846, confirm that this core teaching of the Church remains valid:

Basing itself on Scripture and Tradition, the Council teaches that the Church, a pilgrim now on earth, is necessary for salvation: the one Christ is the mediator and the way of salvation; he is present to us in his body which is the Church. He himself explicitly asserted the necessity of faith and Baptism, and thereby affirmed at the same time the necessity of the Church which men enter through Baptism as through a door. (Apostolic Constitution *Lumen Gentium*, 14)

The lay faithful of the St. Benedict Center deserve a commendation for their hard work in spreading one of the most important doctrines of the Gospel of the Lord Jesus Christ. Instead, they suddenly find themselves persecuted by the Vicar of Bishop Libasci.

In the vicar’s mind, the truth being denied by the members of the St. Benedict Center is the heresy that is exactly opposed to the Church’s dogma *Extra Ecclesiam Nulla Salus*: “outside the Church *there is salvation.*” The vicar

has changed dogma into heresy. [Tweet](#)

What did the vicar of Manchester exactly do?

Apart from officially notifying them in writing and publicly, *res inaudita* (“a thing unheard of”) that “affirmations of faith using the Athanasian Creed ... are invalid”, **and that the Professions of Faith employing the Athanasian Creed that were signed by the members of their community in 2009 are “null and void,”** the vicar warned that by remaining steadfast in their adherence to the dogma *Extra Ecclesiam Nulla Salus*, they have “persisted in their obstinacy,” explicitly referencing canon 751 of the Code of Canon Law.

This canon states: “Heresy is the obstinate denial or obstinate doubt after the reception of baptism of some truth which is to be believed by divine and Catholic faith.”

Manchester Bp. Peter Libasci

In layman's terms, the vicar of Manchester **has publicly accused them of being obstinate heretics** by publicly spreading their belief in the official teaching of the Church that outside the Church there is no salvation. **In the vicar’s mind, the *truth* being denied by the members of the St. Benedict Center is the heresy that is exactly opposed to the Church’s dogma *Extra Ecclesiam Nulla Salus*: “outside the Church *there is salvation*.”** The vicar has changed dogma into heresy.

De Laire is said by current work colleagues to be **emotionally unstable** in his role as chief canonical judge of the diocese and counselor to his bishop. Church Militant has learned that there is much more than meets the eye to his fresh attack upon a group of devout lay Catholics. De Laire is said to be desperate to repair his image and save his chances at being promoted as bishop or an official of the Roman Curia.

At least three complaints against Rev. de Laire have been filed with the Holy See. [Tweet](#)

Church Militant has learned **that in recent years, at least three complaints against Rev. de Laire have been filed with the Holy See and made known to Bishop Libasci. Taken together they allege corruption, abuse of office, grave violations of the law, and incompetence as a canonist, even warning Vatican officials that in no case whatsoever should de Laire be named bishop. And these matters were entirely unrelated to the St. Benedict Center.**

Georges de Laire

With incompetence in canonical matters also apparently well-known and corroborated in the Roman Curia, de Laire is nicknamed in those halls "*un incasinaro*," "a **troublemaker**" owing to his notorious botching of canonical cases involving clergy and other matters. Multiple independent sources in the Roman Curia say that he has repeatedly **botched diocesan cases and embarrassed his bishop** before the Roman congregations of the Curia.

De Laire's incompetence has reached such a point that Church Militant has learned that he is currently outsourcing work product that he as a canon lawyer is being paid well by the diocese to complete himself to the canonical community at large, at increasingly great expense to the diocese.

On a professional level, he is said by priests and laity who currently work with him in the diocese to be a vindictive and manipulative clericalist who pines to be named a bishop or an official of the Congregation for the Doctrine of the Faith. Hence his attack on the Saint Benedict Center, a "useful situation" designed to redirect attention away from complaints regarding his performance and instead to his "skill" as an expert in doctrinal matters, notwithstanding his **incompetence** in things canonical.

De Laire is said by priests and laity who currently work with him in the diocese to be a

vindictive and manipulative clericalist. [Tweet](#)

Additional questions are raised, however, not just by the recent decisions of the Vicar affecting Catholic faithful under his power, but also by his acquisitions. While Pope Francis has checked into a hotel instead of the Apostolic Palace for lodging, Church Militant has learned that de Laire now frequently resides at an estate located near Manchester that he recently purchased, currently valued at \$1.5 million, an exclusive 4,000-square-foot, four-bedroom residence with 600 feet of waterfront, waterfalls and a koi pond.

VICAR OF MANCHESTER CHANGES DOGMA INTO HERESY

Official abuses Power of Office to Corrupt the Faith and Persecute the Faithful

By Church Militant

In a shocking shell game worthy of a street trickster, a chancery official appointed by Bishop Libasci of the Diocese of Manchester in New Hampshire has changed a solemnly defined Dogma of the Faith into a Heresy.

Rev. Georges De Laire, a Frenchman with a penchant for revolution, timed his actions to coincide with his bishop departing for Chicago to do penance for abusive priests. On January 7, 2019, he struck.

In an undated text, the official imposed a series of 15 commandments (5 more than the Lord Himself imposed upon Mankind) upon members of the Saint Benedict Center, a community of devout lay women and men working in toil and personal sacrifice to spread the Church's official teaching on the need for all souls to join the Church in order to be saved.

The teaching was raised to the level of a solemnly defined Dogma of Divine and Catholic Faith ("*De Fide Divina et Catholica Solemniter Definita*") by none other than Pope Boniface VIII. In November 1302, in what the historian Brian Tierney calls "the most famous of all the documents on church and state" called *Unam Sanctam* ("One Holy"), Pope Boniface VIII, invoking the plenitude of his apostolic power, defined that "*Extra Ecclesiam Nulla Salus*," "Outside the Church there is no salvation."

Even the Second Vatican Council and the current *Catechism of the Catholic Church*, in art. 846, confirm that this most ancient of core teachings of the Church remains valid:

Basing itself on Scripture and Tradition, the Council teaches that the Church, a pilgrim now on earth, is necessary for salvation: the one Christ is the mediator and the way of salvation; he is present to us in his body which is the Church. He himself explicitly asserted the necessity of faith and Baptism, and thereby affirmed at the same time the necessity of the Church which men enter through Baptism as through a door. (Apost. Const. *Lumen Gentium*, 14)

One would think that such a group of rare Catholics deserved commendation if not assistance on the part of the bishop and his vicar to help spread such an important doctrine of the Gospel of the Lord Jesus Christ.

What did the Vicar of Manchester do instead? Apart from officially notifying the lay faithful that "**affirmations of faith using the Athanasian Creed [...] are invalid**", ("*res inaudita*", "*a thing*

unheard of” as is said in ecclesiastical circles), the vicar warned the lay faithful that by remaining steadfast in their adherence to the dogma, “*Extra Ecclesiam Nulla Salus*”, that they have “persisted in their obstinacy,” referencing canon 751 of the *Code of Canon Law* which states:

Can. 751. Heresy is the **obstinate** denial or obstinate doubt after the reception of baptism of some truth which is to be believed by divine and Catholic faith.

In layman’s terms, the Vicar of Manchester has accused them of committing **heresy** by publicly spreading their belief in the official teaching of the Church that outside the Church there is no salvation. According to the vicar, therefore, it is defined truth that *Outside the Church there is salvation*, the complete opposite of what the Church officially teaches. The vicar has changed dogma into heresy.

Said by current work colleagues to be emotionally unstable in his role as chief canonical judge of the diocese and counsellor to his bishop, Church Militant has learned that there is much more than meets the eye to Georges De Laire’s fresh attack upon a group devout lay Catholics: De Laire is said to be desperate to reprimatinate his credentials as a canonist and save his chances at being promoted as bishop or an official of the Roman Curia.

Church Militant has learned that at least three formal complaints have been filed with the Holy See regarding Rev. Georges De Laire’s treatment of lay faithful, alleging deliberate corruption and abuse of power on his part in the exercise of his office of judicial vicar.

A Catholic faithful of the diocese filed a denunciation against De Laire with the Apostolic Nuncio in Washington D.C., the Secretariat of State of the Vatican, and the Congregation of Bishops, warning Church officials that in no case whatsoever should De Laire be named bishop due to his deliberate abuse of power as judicial vicar and his incompetence as a canonist.

With such incompetence in canonical matters also apparently well-known and corroborated in the Roman Curia, De Laire is nicknamed “il casíno”, “an utter mess of a canonist” due to his notorious botching of cases involving clergy and other matters. He is said to have repeatedly embarrassed Bishop Libasci before the Roman Congregations of the Curia.

De Laire’s incompetence has reached such a point that Church Militant has learned that De Laire is currently outsourcing work product that he as a canon lawyer is being paid by the Diocese to complete himself to the canonical community at large, at increasingly great expense to the diocese.

On a professional level, he is said by priests and laity who currently work with him in the diocese to be a vindictive and manipulative clericalist who pines to be named a bishop or an official of the Congregation for the Doctrine of the Faith. Hence his attack on the Saint Benedict Center, a “useful situation” designed to redirect attention away from complaints regarding his performance

to his “skill” as an expert in doctrinal matters, notwithstanding his incompetency in things canonical.

While Pope Francis checked into a hotel instead of the Apostolic Palace for lodging, De Laire recently purchased in his own name an estate valued at \$1,500,000.00 dollars, an exclusive 4,000 sq. ft., 4-bedroom residence with 600’ of waterfront, waterfalls, and – a Koi pond. With what monies did the Vicar of Manchester, a parish curate, purchase such a luxurious property?

In an interview given by him to NHPR (New Hampshire Public Radio) entitled, “The Life of a Priest” De Laire talked “about how the issue [of sexual abuse] has affected him” “and reflects on “his own views of the profession.”

Gazing across the lake surrounding his estate, apparently his “view” of his profession as a priest and Vicar of Manchester is not so bad after all.